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NCBC DAVISVILLE
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LETTER REGARDING U S EPA REGION I COMMENTS ON DRAFT PROPOSED PLAN FOR
INSTALLATION RESTORATION PROGRAM SITE 16 NCBC DAVISVILLE RI
5/6/2013
U S EPA REGION I



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND - REGION I
5 POST OFFICE SQUARE, SUITE 100 (OSRR 07-03)
BOSTON, MASSACHUSETTS 02109-3912

May 6, 2013

Jeff Dale, Dept of the Navy, BRAC PMO Northeast
 Code 5090 BPMO NE/JD, 4911 South Broad St
 Philadelphia, PA 19112-1303

Re: *"Draft Proposed Plan for Installation Restoration Program Site 16 for former Naval Construction Battalion Center, North Kingston, Rhode Island"*, dated March 2013, North Kingstown Rhode Island

Dear Mr. Dale:

Pursuant to § 7.6 of the Davisville Naval Construction Battalion Center Federal Facility Agreement dated March 23, 1992, as amended (FFA), the Environmental Protection Agency has reviewed the subject document and comments are below.

SPECIFIC COMMENTS

Comment Number	Page	Location	Comment
1	1	Scroll and Box	<ul style="list-style-type: none"> Describes a public "meeting," but the "Let Us Know What You Think" box describes a public hearing. Revise for consistency.
2	1	Box	<ul style="list-style-type: none"> In the third bullet add at the end: "until groundwater cleanup standards are achieved"
3	2	Globally	<ul style="list-style-type: none"> Revise "Site" to "site 16". The NPL Site is capitalized the subareas of the Site are not capitalized.
4	1	Introduction paragraph	<ul style="list-style-type: none"> In the second sentence remove "and the Environmental Protection Agency (EPA)," and insert after "concurrence from" insert "the Environmental Protection Agency (EPA) and."
5	2	Exhibit 1 box	<ul style="list-style-type: none"> In the last sentence of the third paragraph it says the site is not the "primary source" of PAHs to sediments, but on page 4 it says the site activities are "unlikely" to be a source" of the PAHs. Use consistent terminology.
6	3	Figure 1	<ul style="list-style-type: none"> A legend is needed to identify the red outlined area as Site 16. The current call-out box is not sufficient since the area at OU8 is also outlined in red. Add an overview map showing the relative position of the

Comment Number	Page	Location	Comment
			Davisville NCBC within the state.
7	4	First paragraph	<ul style="list-style-type: none"> Define “plume” as “an area of VOC-contaminated groundwater.” Provide an example of VOCs, such as TCE.
8	4	Third paragraph	<ul style="list-style-type: none"> Define “fill material” and “subsurface”
9	4	Sixth paragraph	<ul style="list-style-type: none"> Define “industrial/commercial” as prohibiting residential use. Correct spelling of “restricted.” For the marina “restricted recreational use” needs to be defined, since the way the Navy is proposing using the term (meeting residential standards in the top two feet and then LUC restrictions to prevent disturbance of subsurface soil) is different than how the term is used in the RI Remediation Regulations (limited, controlled recreational activity that permit industrial cleanup standards to be applied rather than the normal residential cleanup standards for “unrestricted” recreational used.
10	4	9 th paragraph	<ul style="list-style-type: none"> A heading should be added before this paragraph. Suggest “VOC Results” or similar to inform reader this section specifically refers to VOC results in various media.
11	4	10 th paragraph	<ul style="list-style-type: none"> A heading should be added before this paragraph. Suggest “PAH Results” or similar to inform reader this section specifically refers to PAH results in various media.
12	4	11 th paragraph	<ul style="list-style-type: none"> Define surface soil, shallow subsurface soil, and shallow groundwater. The last sentence says sediment PAHs are “unlikely” to be from historical operations while the Exhibit 1 Box on page 2 says site operations are not the “primary source” of sediment PAHs. Use consistent terminology.
13	4	12 th paragraph	<ul style="list-style-type: none"> Explain whether dioxins/furans were detected in surface, shallow or deep soil.
14	4	13 th paragraph	<ul style="list-style-type: none"> The first sentence should be moved toward the end of this paragraph. Revise second sentence to read “Most locations with arsenic or lead are within the northwestern portion of the NCA.”
15	5	Figure 2	<ul style="list-style-type: none"> Figure is very busy, is everything needed? This figure should reflex the locations of the buildings and activities noted in the proposed plan on page 4 not everything Navy has done in site 16. Figure refers to “Suspected FFA...” but “suspected” is nowhere in document text. Revise for consistency.

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			<ul style="list-style-type: none"> • Figure refers to suspected USTs. Navy removed several USTs in EBS 28 area. Remove the word suspected. • Need to use a call-out box or a legend to identify the black line around the NCA. • Legend is blank for “Developed area...” and “Undeveloped...” • The blue boundary (TCE groundwater plume) extends into Narragansett Bay. Is this eastern extent confirmed or assumed? If assumed, a different boundary line should be used to depict that extent, such as a dashed blue line. • The marina area should be delineated as a separate area from the adjacent undeveloped north central area (it is currently, and will continue to be; operated as a recreational facility and has different cleanup standards).
16	6	1 st paragraph	<ul style="list-style-type: none"> • Revise 3rd sentence to “...environmental investigations at other <u>Davisville, NCBC</u> sites...”
17	6	2 nd paragraph	<ul style="list-style-type: none"> • Define ROD here
18	6	3 rd paragraph	<ul style="list-style-type: none"> • Define RI/FS
19	6	7 th paragraph	<ul style="list-style-type: none"> • 3rd sentence, add “hypothetical potential” in front of the word residents. (Consistent with eco risk section.)
20	6	11 th paragraph	<ul style="list-style-type: none"> • 1st bullet, define surface soil; delete “(but not exclusively)” it is redundant • 1st bullet, add exposure between acceptable and level
21	6	11 th paragraph	<ul style="list-style-type: none"> • 2nd bullet, delete “(but not exclusively)” it is redundant; also delete “in the northwestern portion of the NCA” because this area is not unique and does not have a different remedy from other areas in the NCA. • See comment above regarding the terminology used associated with recreational exposure to subsurface soil.
22	6	11 th paragraph	<ul style="list-style-type: none"> • Third sentence, change current sentence to “...found in groundwater, including PAHs...” • Remove the comma after the word metals
23	7	1 st paragraph	<ul style="list-style-type: none"> • Remove the sentence that begins “However, most of...” because the conditionality described is not fully explained in the paragraph.
24	7	1 st bullet	<ul style="list-style-type: none"> • Revise first bullet to read, “There are no risks to individuals touching...” • Define seeps as “groundwater seeping into Allen Harbor” or similar
25	7	2 nd bullet	<ul style="list-style-type: none"> • . The bullet should explain that (according to earlier text previously commented on), there is limited-to-no site-

Comment Number	Page	Location	Comment
			related contamination in the sediment, therefore there is no CERCLA risk
26	7	Step 1	<ul style="list-style-type: none"> All bullets, identify the location of offending surface soil, and surface water
27	7	12 th paragraph	<ul style="list-style-type: none"> Revise the paragraph to more clearly explain what the predominant COPCs are. As it currently reads, PAHs may be interpreted to be the predominant COPCs. Remove the discussion of any sediment COPCs. Define surface soils. The “point of clarification” should only be included in the human health risk assessment section. This section is discussing the RI not the FS. However, the sentence should include a brief explanation of the results and why it is OK to discard pesticides from the risk assessment.
28	7	Step 2	<ul style="list-style-type: none"> The term “groundwater-seeps/surface water” is not consistent with other text describing seeps. Revise for consistency. Remove “sediments”
29	7, 8	Step 3	<ul style="list-style-type: none"> The term “groundwater-seeps/surface water” is not consistent with other text describing seeps. Revise for consistency. Remove discussion of sediments Define surface soils. Define the meaning of “limited” in second sentence, or remove term. Replace “...refined information regarding...” with “...refined analysis about...”
30	8	1 st bullet	<ul style="list-style-type: none"> Move the first bullet concerning sediments to the beginning of both the human health and eco-risk sections and modify it to say that sediment (although evaluated in the risk assessments) was not a media of concern because sediment contamination is not site-related and does not exceed local anthropogenic background levels (as noted previously, be consistent on the terminology used to discuss this throughout the document).
31	8	RAO Paragraph	<ul style="list-style-type: none"> Last sentence implies that specific soil RAOs were developed for only the Benzene sub-area; specific RAOs were also developed for Marina Building and NCA. Appears sentence can be revised by removing the text in parentheses.
32	8	Soil RAO 1	<ul style="list-style-type: none"> Page 6, second bullet regarding subsurface soil, states no unacceptable risks to construction workers or trespassers. Also mentioned are exposures to dioxins/furans. However,

Comment Number	Page	Location	Comment
			Page 8 Soil RAO 1 includes construction workers but no mention of trespassers. And no mention of dioxins/furans. Revise as appropriate.
33	8	Soil RAO 2&5	<ul style="list-style-type: none"> For the text of each of these RAO insert “, sediment, and surface water” after “groundwater.” These are only RAOs for Soil Alternative 5. The Soil RAOs for Soil Alternative 3A would replace “groundwater” with “sediment and surface water.”
34	8	Soil RAO 7	<ul style="list-style-type: none"> Remove the risk details now (text in parentheses)? Reference to Exhibit 2 more appropriate in 1st column paragraph describing RAOs.
35	8	Groundwater RAO1	<ul style="list-style-type: none"> Groundwater RAO 1 is temporary outside of the waste management area (until groundwater cleanup standards are achieved) and a permanent RAO inside of the compliance boundary for the waste management area.
36	8	Groundwater RAO 4	<ul style="list-style-type: none"> Briefly describe “beneficial use” RAO4 only applies outside of the compliance boundary for the waste management area.
37	8	FS paragraph	<ul style="list-style-type: none"> Remove or explain “primary” in the sentence “...cleanup levels were developed for the primary soil COCS...”
38	8	Groundwater COC paragraph	<ul style="list-style-type: none"> Remove or explain “primary” in the sentence “...cleanup levels were developed in the FS for the primary groundwater COCS...” There are “cleanup levels” for groundwater outside of the waste management area compliance boundary and “performance standards” (for monitoring) for groundwater inside of the compliance boundary.
39	8	Summary of Remedial Alternatives	<ul style="list-style-type: none"> At the end of this paragraph, add “There are 7 remedial alternatives for soil and 8 for groundwater.” Add at the beginning of the first sentence: “A number of.” In the last sentence insert “in the Feasibility Study Addendum” after “developed.”
40	9	Table 1	<ul style="list-style-type: none"> Define the values in parentheses in the Industrial User column. Split the industrial column so that there is a column for direct exposure standards (under Alternative S-3A and a separate column of leachability standards (for the other Soil Alternatives). Revise column heading to “Residential/Recreational User” For the “Residential/Recreational User” split the column so that there is a column for direct exposure standards (under Alternative S-3A and a separate column of leachability

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			standards (for the other Soil Alternatives).
41	9	Footnotes 3, 4	<ul style="list-style-type: none"> Revise footnote text to state "...State of Rhode Island Residential Direct Exposure Criteria. ...State of Rhode Island Industrial/Commercial Direct Exposure Criteria."
42	9	Footnote 4	<ul style="list-style-type: none"> Remove the footnote because the residential standards apply both to the marina area where soil will be cleaned up in the top two feet to the residential standards, and to the marina subsurface soils and all soils throughout the remainder of the Site where residential standards will be used as the basis for establishing LUC boundaries.
43	9	Table 1 and Footnote 5	<ul style="list-style-type: none"> In some cases in the table, the word "Leach" includes footnote 5, not in others. Also, define "Leach" abbreviation in the footnote. In footnote 5, only standards for RI GA leachability should be included At the end of the first sentence add: "and downgradient sediment and surface waters."
44	9	Footnote 6	<ul style="list-style-type: none"> Revise text to "...considered in the development of the remedial alternatives..." Also, the sentence on RIDEM criteria should clarify these criteria (e.g. direct exposure, leachability). Remove the second sentence since TPH standards should not be considered under the development of the CERCLA alternatives (contaminated soil with both TPH and CERCLA contaminants can only be remediated under a ROD to address the CERCLA exceedances).
45	10	Table header vs. Footnote 1	<ul style="list-style-type: none"> Revise or explain different use of phrase "groundwater cleanup levels" vs. "groundwater cleanup goals" or revise for consistency. The third sentence of footnote 1 should be moved to a new footnote (that will become the new footnote 1) that footnotes the Table header, since the issue of cleanup standards vs. performance standards applies to all of the contaminants in the table. Screening levels (naphalene) and SDWA Action Levels (lead) are not used to set cleanup goals, instead the screening/action levels reference risk-based standards for establishing the cleanup level. So, for naphalene and lead cite as "EPA risk-based standards" and add a footnote for each contaminant citing the guidance used to establish the level (these guidance should then be cited as TBCs in the groundwater chemical-specific ARARs tables). Remove Facility Wide Background and replace with

Comment Number	Page	Location	Comment
			"MCL or Facility-Wide Background whichever is higher" as was agreed during the BCT meeting.
46	10	Footnote	<ul style="list-style-type: none"> • Add EPA before MCL • Regarding the second sentence, only exceedances of MCLs & RIDEM standards were actually used to identify additional contaminants in the Table, so remove ", non-zero MCLGs." • Delete RIDEM from footnote or add to table in applicable location (nickel)
47	11	Bullet Soil Alternatives	<ul style="list-style-type: none"> • The concept of a waste management area is not a specific component only of alternative S-3A, it applies to every soil alternative where waste is left in place. It doesn't add any requirements to the soil alternatives where it is present.
48	11	Bullet Groundwater Alternative G-3, G-4, G-5	<ul style="list-style-type: none"> • High concentration area not shown on Figure 4. Add.
49	11	Bullet Groundwater Alternative G-3A	<ul style="list-style-type: none"> • Source area not shown on Figure 4. Add.
50	11	Alternative S-2	<ul style="list-style-type: none"> • Recommend revising first sentence to: "Alternative S-2 applies to selected areas in the NCA where contaminant concentrations exceed industrial cleanup levels. The alternative involves covering these areas with a 2-foot-thick cover of clean soil obtained from an off-site location. This will prevent unacceptable exposure to the underlying contaminated surface and subsurface soil." • Describe the low permeability cover (e.g. clay or liner)
51	11	Alternative S-2 (second column)	<ul style="list-style-type: none"> • Recommend revising last sentence to "...LUCs that would allow recreational use but prohibit residential use..." As the sentence currently reads, it is unclear whether the term "restrict" means <i>prevent</i> or <i>exclude to only</i>.
52	11	Alternative S-3 AND Alternatives where same text is used	<ul style="list-style-type: none"> • Need better description of the word "deeper" in the 3rd sentence (i.e.; saturated). • Recommend revising last sentence to "...LUCs that would allow recreational use but prohibit residential use..." As the sentence currently reads, it is unclear whether the term "restrict" means <i>prevent</i> or <i>exclude to only</i>. • Change "...unauthorized excavation and/or disposal of soils below 2 feet bgs." to "...unauthorized soil excavation or soil disposal or both below 2 feet bgs."

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53	11	Alternative S-3A AND Alternative where same text is used	<ul style="list-style-type: none"> • Add the word “Cover” to the title- it should replace the words “waste management area” since covers are an integral part of this remedy that distinguishes it from other alternatives. A WMA is included in other alternatives, but hasn’t been included in the title. Please remove these words (WMA) from this title. • Take the third sentence and move it to a new paragraph to discuss the Marina area. • Change the text of the marina paragraph to “LUCs would be implemented to permit the continued use of the area as a marina or other recreational use, while preventing disturbance of the cover and prevent the unauthorized excavation and/or disposal of contaminated soils below 2 feet bgs. Long-term monitoring would be required that includes at least yearly inspections to determine whether that LUCs were being complied with and that components of the remedy, particularly the cover, were not disturbed. Groundwater and/or sediment/surface water monitoring would be conducted to ensure underlying contamination is not migrating from the covered area to Allen Harbor. Long-term maintenance would be implemented to maintain the 2-foot of clean soil cover and other components of the remedy. • Remove the fourth sentence. • Replace the fifth and sixth sentences with: “LUCs would be implemented to prevent residential use of all areas exceeding residential risk levels, outside of an area around Building E-107, discussed below. In areas where there is a cover installed, the LUCs would also prevent disturbance of the cover and other components of the remedy, as well as preventing the unauthorized excavation and/or disposal of soils below 2 feet bgs. Long-term monitoring and maintenance would also be required that includes inspections and any required maintenance of the cover, as well as groundwater and/or sediment/surface water monitoring to ensure underlying contamination is not migrating from the cover area to Allen Harbor or Narragansett Bay. At least yearly compliance monitoring would ensure LUCs were being complied with.”
54	12	Figure 3	<ul style="list-style-type: none"> • Need clearer, thicker boundary lines. Recommend removing segmented proposed excavation area; just outline the entire proposed excavation area and also label it “Boundary of soil cover”. Remove or include in the legend, the yellow outline with no legend definition. Need

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			<p>dock legend or place dock text over dock outline. Generally difficult figure to quickly make sense of.</p> <ul style="list-style-type: none"> • Add a line to show the boundary of the groundwater restricted area.
55	13	Figure 4	<ul style="list-style-type: none"> • Add legend • The figure should be labeled Soil Alternatives S-2, S-3, S-3A, S-4 & S-6 since there is no soil LUC boundary for either Alternatives S-1 or S-5. • Improve line contrast between soil Cover boundary and Soil LUC boundary. • Instead of a WMA boundary show the extent of the Soil Cover Areas. • Soil Cover Areas should include the area to be excavated & covered at the Marina since that area has waste being managed in place also. • Define differing clean up areas per Groundwater Alternatives bullets on Page 11 (define “high-concentration areas,” “east end of Former Building 41,” and “source area.” In particular, identify where cover areas are proposed.
56	14	Alternative S-4	<ul style="list-style-type: none"> • What is the intent of using the word “balance” in the 2nd sentence? Recommend different description here.
57	14	Alternative S-5	<ul style="list-style-type: none"> • In the second sentence, change “offsite” to “off-site” for consistency. • After “excavated” insert “to achieve residential-exposure-based and leachability-based soil clean-up levels,”
58	14	Alternative S-5	<ul style="list-style-type: none"> • Add a figure showing the components and extent of Soil alternative S-5.
59	14	Alternative S-6	<ul style="list-style-type: none"> • 1st sentence, change “...soil cover over the full extent of the entire NCA...” to “...soil cover over the NCA...” • 3rd sentence, add contaminant before migration
60	14	Alternative G-1	<ul style="list-style-type: none"> • 1st sentence, change “...in order to...” to “...to...”
61	14	Alternative G-2 AND Alternatives were same text used	<ul style="list-style-type: none"> • Text should discuss “Performance Standards” applicable within wma established under the appropriate soil alternatives. • 3rd sentence, describe the type of use that the groundwater LUC prevents. • The text should discuss whether the alternative can only be pared with Soil Alternatives S-2, S-3, S-3A, S-4, S-6 (otherwise if Alt. S-5 is chosen this groundwater alternative would need to meet groundwater cleanup standards throughout the site).

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			<ul style="list-style-type: none"> The text needs to identify how long MNA is expected to take to achieve groundwater cleanup standards outside of the wma compliance boundary for the various soil alternative with an wma and for throughout the site under Alternatives S-1 and S-5. The text should clarify that LUCs would be permanent within the compliance boundary of any wma established under the various soil alternatives with a wma and temporary outside of the compliance boundary and for the entire Site for Alternative S-5 for the period it takes to achieve groundwater cleanup standards.
62	14	Alternative G-3 AND Alternative where same text used	<ul style="list-style-type: none"> The same analysis discussed above for G-2 needs to be applied how this groundwater alternative would work paired the various soil alternatives with and without a wma. Provide a Figure showing 1,000 ug/l TCE contour 3rd sentence, add groundwater between routine and sampling. 5th sentence, add text to generally describe construction methods that prevent unacceptable vapor intrusion (e.g. vapor barrier).
63	14	Alternative G-3A	<ul style="list-style-type: none"> The same analysis discussed above for G-2 needs to be applied how this groundwater alternative would work paired with the soil alternatives with or without a wma. Show on figure "source areas near former Building 41" where injections are planned. Show on figure "area down gradient of treatment area" where MNA would be monitored by a routine groundwater sampling program.
64	15	Alternative G-5	<ul style="list-style-type: none"> 1st sentence, change "...extraction and treatment..." to "...extraction and above-ground treatment..." The same analysis discussed above for G-2 needs to be applied how this groundwater alternative would work paired with the soil alternatives with or without a wma.
65	15	Alternative G-6	<ul style="list-style-type: none"> The same analysis discussed above for G-2 needs to be applied how this groundwater alternative would work paired with the soil alternatives with or without a wma. Use consistent term to describe "biological degradation" vs. "biodegradation" Change last sentence to "Because carbon source injections would occur over a larger area compared to other injection alternatives, faster groundwater remediation is expected with this alternative."
66	15	Preferred	<ul style="list-style-type: none"> Add a figure showing the preferred alternative.

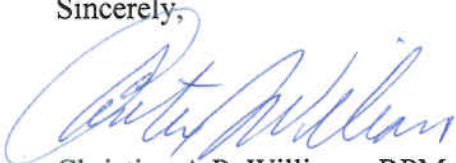
Comment Number	Page	Location	Comment
		Alternative	<ul style="list-style-type: none"> The Proposed Plan needs to clearly identify in the text and in a figure which properties are still owned by the Navy and which properties are no longer Navy owned, as well as LUC requirements that will need to be established on non-Navy property. The owners of the non-Navy property within the Site need to be directly notified of the issuance of the Proposed Plan and their opportunity to comment. 2nd sentence, add “currently” between “is” and “required”, since Navy is proposing a contingency remedy incase the contaminant migration from the NCA increases and causes a risk to the environment in Allen Harbor. Add a section since, based what the ARARs table in the FS states for S-3A, in the Proposed Plan: “The Navy will solicit public comment as part of the proposed plan on the measures taken through the remedial action to protect floodplain and wetland resources.” Specifically add that the covers will be installed and maintained to prevent any release of contamination that would impair federal floodplain (prevent washout in a 100 year storm event) or wetland resources.
67	15	2 nd bullet	<ul style="list-style-type: none"> Residential standards are also exceeded in the NCA area, but will be addressed through LUCs. In the marina area the exceedances will be addressed through a combination of excavation and off-site disposal of the surface 2 feet of contaminated soil and LUCs to prevent exposure to subsurface soils exceeding unrestricted use standards below 2 feet. Please add.
68	16	Exhibit 3	<ul style="list-style-type: none"> Number the 9 criteria Add at the end of the “Community Acceptance” criterion “The Navy will respond to the public’s comments on the Proposed Plan in a Responsiveness Summary the will be part of the final Record of Decision.”
69	16	Soil Alternative S-3A	<ul style="list-style-type: none"> Add a new 1st bullet: “Two foot soil covers will be maintained and monitored to ensure underlying contaminated soil is not disturbed and that contamination is not migrating from the covered areas to Allen Harbor and Narragansett Bay.” Change the text of the 1st bullet to: “LUCs will permit restricted recreational use in the Marina area and prevent residential development in the NCA area. There will be at least yearly compliance monitoring of LUCs and five-year reviews will be conducted to assess the protectiveness of the remedy since contamination is being left in place.”
70	16	Groundwater	<ul style="list-style-type: none"> New 1st bullet: “This alternative is paired with Soil

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		Alternative G3-B	<p>Alternative S-3A , which creates a waste management area has a groundwater compliance boundary established around it. Groundwater outside of the compliance boundary needs to attain federal drinking water standards over time through treatment and MNA, while inside the compliance boundary contaminated groundwater is only required to be monitored to ensure it is not migrating and causing harm to Allen Harbor, Narragansett Bay, or surrounding areas of uncontaminated groundwater.”</p> <ul style="list-style-type: none"> • Replace the first bullet with: “LUCs will prevent exposure to contaminated groundwater outside of the compliance boundary until groundwater cleanup standards are attained. The LUCs will permanently prevent exposure to groundwater inside of the compliance boundary. • Remove the second bullet. • In the 3rd bullet after “Allen Harbor” insert “and Narragansett Bay” and insert “currently” after “does not.” • In the 4th bullet, it is unclear why the phrase “permanently and irreversibly” added to this description when the same is true of other alternatives. Such colorful text could be interpreted by general readers as a benefit unique to this alternative, but to a technical audience it comes across as a slight bias rather than possibly intended emphasis. • In the fifth bullet replace the second sentence with: “Under this alternative groundwater outside of the compliance boundary is calculated to take approximately 100 years to attain drinking water standards, compared to 300 years from the MNA only alternative G-2.”
71	17	Alternative S-5	<ul style="list-style-type: none"> • Change criterion 4 to the “does Not meet” symbol
72	17	Costs	<ul style="list-style-type: none"> • Where are groundwater and/or sediment/surface water monitoring, as well as yearly LUC compliance monitoring, included in the costs? Add a footnote if the costs are incorporated into the monitoring for Alt. G-3B.
73	17	Assumed Duration	<ul style="list-style-type: none"> • Add footnote describing method/rationale behind assumption
74	17	Modifying Criteria	<ul style="list-style-type: none"> • Remove the two empty cells
75	17	Community Acceptance	<ul style="list-style-type: none"> • Replace “feasibility study and” with “the.”
76	17	Notes	<ul style="list-style-type: none"> • Change “Criteria” to “Criterion.”
77	18	Line 4	<ul style="list-style-type: none"> • Change the symbols for G-1 to “Does Not Meet Criterion.”
78	18	Modifying Criteria	<ul style="list-style-type: none"> • Remove the two empty cells

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79	18	Community Acceptance	<ul style="list-style-type: none"> Replace “feasibility study and” with “the.”
80	18	Assumed Duration	<ul style="list-style-type: none"> Add footnote describing method/rationale behind assumption
81	18	Notes	<ul style="list-style-type: none"> Change “Criteria” to “Criterion.”
82	19	4 th Paragraph	<ul style="list-style-type: none"> After “on-line” insert “(see second column).”
83	19 & 20	Glossary of Terms	<ul style="list-style-type: none"> The definition of Background should include anthropogenic background also (man-made contaminants in the area from non-Navy sources) Add Feasibility Study Addendum

If you have any questions with regard to this letter, please contact me at (617) 918-1384.

Sincerely,



Christine A.P. Williams, RPM
Federal Facilities Superfund Section

cc: Richard Gottlieb, RIDEM (via e-mail only)
Dave Barney, BEC (via e-mail only)
Johnathan Reiner, ToNK
Steven King, RIEDC
Rudy Brown, EPA(via e-mail only)
David Peterson, EPA(via e-mail only)
Andrew Glucksman, Mabbett (via e-mail only)
Lee Ann Sinagoga, Tetra Tech NUS, Inc (via e-mail only)